



WISCONSIN LEGISLATIVE COUNCIL RULES CLEARINGHOUSE

Scott Grosz
Clearinghouse Director

Margit Kelley
Clearinghouse Assistant Director

Anne Sappenfield
Legislative Council Director

Jessica Karls-Ruplinger
Legislative Council Deputy Director

CLEARINGHOUSE RULE 19-087

Comments

[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Legislative Reference Bureau and the Legislative Council Staff, dated December 2014.]

2. Form, Style and Placement in Administrative Code

- a. The agency should revise the style of the enumeration of provisions treated by the rule to conform to the style described in s. 1.02, Manual.
- b. The agency should review s. DHS 105.17 (1k) (a) 4. for consistency with par. (a) (intro.). Should the word “have” precede the word “training”?
- c. In s. DHS 105.17 (1k) (b), the proper cross-reference should be to “par. (a)”. [s. 1.07 (2), Manual.]
- d. In s. DHS 105.17 (5) (c), the agency should use the phrase “may not” instead of the phrase “shall not”. Additionally, in this provision, the agency should refer to “sub. (1e) (e)” rather than “DHS 105.17 (1e) (e)”.
- e. In SECTION 11 of the proposed rule, “Wisconsin administrative register” should be changed to “Wisconsin Administrative Register”.

5. Clarity, Grammar, Punctuation and Use of Plain Language

The agency should clarify its intent with respect to distinguishing between the terms “delegated act” and “delegated medical act” within the rule text. [See Clearinghouse Rule 15-099 for recent revisions by the Board of Nursing regarding its use of the terms.] If the agency intends for each term to mean the same thing, it should instead consistently use only one term.